

Exhibit

1

UNITED STATES DISTRICT COURT

for the
District of Maryland

Ranjith Keerikkattil

Plaintiff

v.

Freeman A. Hrabowski, et al.

Defendant

Civil Action No. 13-CV-02016 WMN

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: Custodian of Records, c/o David Gleason, General Counsel, University of Maryland Baltimore County, 1000
Hilltop Circle, Admin. Bldg. 1012, Baltimore, MD, 21250

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment A

Place: 4707 Grand Bend Drive, Catonsville, MD, 21228

Date and Time:

02/07/2014 4:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

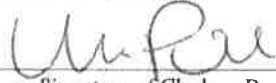
Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 1/7/14

CLERK OF COURT



Signature of Clerk or Deputy Clerk

OR

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Ranjith Keerikkattil, who issues or requests this subpoena, are:

Ranjith Keerikkattil, 4707 Grand Bend Drive, Catonsville, MD, 21228; 443-690-1031; rkeerikkattil@gmail.com

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Attachment A

1. Please provide any and all records in your custody, possession or control which are set forth in Appendix B as per the ESI agreement reached between Plaintiff and UMBC. Besides, UMBC shall extend the search for Item # 2 from Fall 2008 to present instead of just Fall 2012. Also, UMBC shall provide all documents and evidence relating to digital forensic analysis it conducted on the audio recorder that it claimed malfunctioned during the Plaintiff's Pre-Hearing Conference.

2. Please provide any and all records in your custody, possession or control which are set forth below, for the period from 2009 to present, relating to Soutry De, Date of Birth: [REDACTED]:

The records are to include, but not be limited to:

- A. Documents and Records relating admission, including applications;
- B. Documents and Records relating to payments for tuition and other expenses, including all financial aid related records;
- C. Course enrollment and course schedules, including dates and times of all courses enrolled by Soutry De;
- D. The name of each teacher, professor or other aid of all courses enrolled by Soutry De;
- E. Attendance Records;
- F. Records of achievement, including transcripts;
- G. Any and all contact information for Soutry De and
- H. Any records of any communication by or relating to Soutry De, in any form, including computer "logs" or "notes".

3. Please provide any and all records in your custody, possession or control which are set forth below, for the period from 2010 to present, relating to Paul Dillon, Deputy Chief of UMBC Police:

The records are to include, but not be limited to:

- A. Documents and Records relating to his employment at UMBC including his employment application;
- B. Documents and Records relating to pre-employment background checks performed on him;
- C. All complaints/allegations of misconduct against him including but not limited to improper sexual relations with UMBC students;
- D. Documents and Records relating to any disciplinary actions taken against him;
- E. Documents and Records relating to any internal/external investigations against him;
- F. Timesheets submitted by him for the pay periods that includes December 3, 2012 and January 15, 2013;
- G. Any and all contact information for Paul Dillon and
- H. Any records of any communication by or relating to Paul Dillon, in any form, including computer "logs" or "notes".

4. Please provide any and all records in your custody, possession or control which are set forth below, for the period from 2008 to present, relating to Jeffrey E. Cullen, Director of Office of Student Judicial Programs (SJP) at UMBC.

The records are to include, but not be limited to:

- A. Documents and Records relating to his employment at UMBC including his employment application;
- B. Documents and Records relating to pre-employment background checks performed on him;
- C. All complaints/allegations of misconduct against him including but not limited to improper sexual relations with UMBC students;
- D. Documents and Records relating to any disciplinary actions taken against him;
- E. Documents and Records relating to any internal/external investigations against him;
- F. Any and all contact information for Jeffrey E. Cullen and
- G. Any records of any communication by or relating to Jeffrey E. Cullen, in any form, including computer "logs" or "notes".

Attachment B

See attached letter dated November 8, 2013.